

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LATOYA PAMPLIN,	)	
	)	
Plaintiff,	)	Case No. 18-cv-8298
	)	
v.	)	Honorable Judge Elaine E. Bucklo
	)	
ILLINOIS DEPARTMENT OF	)	
HUMAN SERVICES, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**DEFENDANTS’ MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

Defendants, Illinois Department of Human Services (“DHS”) and Illinois Central Management Services (“CMS”) (collectively, “Defendants”), by and through their attorney Kwame Raoul Attorney General for the State of Illinois, hereby move to dismiss Plaintiff’s Complaint for failing to state a claim against them, as fully set forth in their Memorandum of Law in Support of their Motion to Dismiss. Defendants respectfully request that this Court grant this motion in their favor.

Dated: February 18, 2019

**KWAME RAOUL**  
Attorney General  
State of Illinois

Respectfully submitted,

/s/ Phillip W. Rehani  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on February 18, 2019, he electronically filed the foregoing document with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system.

/s/ Phillip W. Rehani